

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

DR. KENNETH H. MINCEY,)	CASE NO.: 4:23-cv-01050-JD
)	
Plaintiff,)	
)	
v.)	
)	PLAINTIFF'S ANSWERS TO LOCAL
DEERE & COMPANY and SOUTHEAST)	RULE 26.01 INTERROGATORIES
FARM EQUIPMENT COMPANY,)	
)	
Defendants.)	
)	
)	

Pursuant to Local Civil Rule 26.01, Plaintiff submits the following answers to Interrogatories 26.01 as follows:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: Upon information and belief, Blue Cross Blue Shield of South Carolina and Medicare have subrogation interests. The amount of the liens are unknown at this time.

(B) As to each claim, state whether it should be tried by jury or non-jury and why.

ANSWER: Jury. The case should be tried by a jury because Plaintiff's claims are at law and he seeks monetary damages.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER: The party submitting these answers is not a publicly owned company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER: Plaintiff filed his Complaint in the Court of Common Pleas, County of Marion and Deere & Company removed the case to the Florence Division of the United States District Court for the District of South Carolina based on diversity of citizenship. Plaintiff does not challenge the appropriateness of the division.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, please provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action.

ANSWER: No.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: Not applicable to Plaintiff.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: At this time, Plaintiff is unaware of liability by any other person or legal entity.

(SIGNATURE PAGE TO FOLLOW)

s/Austin H. Crosby

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March 28, 2023
Hampton, South Carolina